

United States District Court  
District of New Hampshire

Christopher Beaulieu  
Plaintiff

2015 JAN 9 AM 10:06

William L. Wrenn  
[REDACTED] et al  
Defendant(s)

Civil Action No. 15-cv-12  
(To be provided by Clerk's Office)

**TO BE COMPLETED BY PLAINTIFF**

(Check One Only)

☐ DEMAND FOR JURY TRIAL

☒ NO JURY TRIAL DEMAND

***COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C § 1983***

I. Parties

A. Please provide the following information for each plaintiff:

1. Name Beaulieu Christopher R  
(Last) (First) (Initial)

2. Place of Detention NH State Prison For men - [REDACTED]

3. Institutional Address PO Box 14  
Concord NH 03302

4. Are you incarcerated pursuant to a pretrial detention order or are you a sentenced inmate?

☐ Pretrial Detention Order

☒ Sentenced Inmate

5. Date pretrial detention order was issued or sentence imposed March 4, 2011

Helen E Hanks - Asst. Commissioner  
105 Pleasant Street, Concord NH 03302

Thomas AKerley - Sgt for RTU  
281 N. State Street Concord NH 03301

Wayne Defeo - Correctional officer  
281 N. State St. Concord NH 03301

Robert P. McGrath - Unit Manager - South and north units  
281 N. State St. Concord NH 03301

Ike Barton - Hearings officer  
281 N. State St. Concord NH 03301

Craig Orlando - Cpl  
281 N. State St. Concord NH 03302

John Thimba - Correctional officer  
281 N. State St. Concord NH 03301

Christopher Berntsen - Correctional officer  
281 N. State St. Concord NH 03301

Christopher Ziemba - Correctional officer  
281 N. State St. Concord NH 03301

Jean Carroll; victim advocate  
105 Pleasant St. Concord NH 03301

Paul Carroll - Lt  
281 N. State St. Concord NH 03301

Richard M. Gerry - warden  
281 N. State St. Concord NH 03302

Joseph Michaud - CO/Former Lt  
281 N. State Street Concord NH 03301

Barbara T. Slayton - LSW.  
281 N. State St. Concord NH 03301

Paul S. Cascio - Captin  
281 N. State St. Concord NH 03301

Deb Green, Mental Health Provider  
281 N. State St. Concord NH 03301

Lois Harriman, APRN -  
281 N. State St. Concord NH 03301

Daryl Bazydlo, mental Health  
281 N. State St. Concord NH 03302

Cathrine Fontaine, NP -  
281 N. State St. Concord NH 03301

Emily Bryant, Aprn

281 N. State St. Concord NH 03301

Paul Brown, DR.

281 N. State St. Concord NH 03301

Jeffrey Fetter, MD, PhD

281 N. State St. Concord NH 03301

Charles G. Boyajian

281 N. State St. Concord NH 03301

Colon K. Forbes, Director

105 Pleasant St  
Concord NH 03

Christopher Kench, Director

281 N. State St. Concord NH 03301

James Brown, Lt

281 N. State Street, Concord NH 03302

Paige Kimball, Cpl

281 N. State St. Concord NH 03302

John Aulis-Co

281 N. State Street Concord NH 03302



Allegation 2: ~~8th~~ <sup>8th</sup> Amendment Violation

Supporting Facts: On January 6, 2012 I told RN Marie McKenna, J.D. hand written Note that I was Raped and wanted STD testing. This resulted in a PREA investigation. I at the time didn't know about the PREA law as a Officer who didn't intake. Failed to inform me of such act. I was then brought to health Service Center and interviewed and Cleared by RN Marie McKenna.

upon my Return I was put on L tier #9. By Cpl C. Orlando. Before leaving to go to the Health Service Center I was in the OIC's office well. In the office I seen 11m ledoux, Anthony out running back and forth on D-Tier. Were he worked as a tier worker. I asked Cpl Orlando why he was out "Cause he was going to find out anyway" was what I was told by Cpl Orlando. On January 8, 2012 I had law library when I was in the Law Library. Inmate Timmie G. Fair came to the Law Library to delay a verball threat from inmate ledoux who never lost his tier job after a Prea was put against him.

Allegation 3: 18 U.S.C § 241 Violation

Supporting Facts: The NH Doc keeps failing to protect me from sexual Assaults, Assaults, sexual Harassment, and other Constitutional Protected Acts. The investigations Bureau keeps putting unfound on everything. Which is starting to show that if Charges pressed they are admitting wrongdoing. Since the Above PREA (Allegation 2) I've been sexually Assaulted 5X assaulted 7X's sexually Harassed 2X's

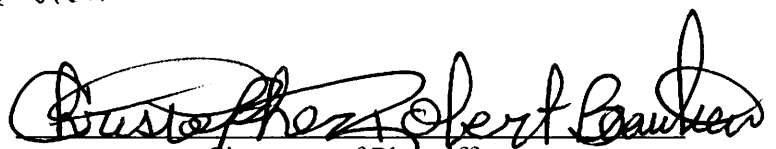
(If more space is needed to explain any allegation or to list additional facts, attach additional pages)

### III. Relief

You must request specific relief in your Complaint. State briefly exactly what you want the court to do for you (attach additional pages if necessary):

- 1) Punitive Damages
- 2) ~~and~~ any and all other Damages deemed equal and right by this Honorable Court
- 3) Medical Staff Stop Denying medical Attention
- 4) That a order be issued to have said people with a Crime that fits
- 5) That the Doc provide me all treatment for G. D.
- 6) That the Doc stop allowing me to be victimized

Date: 1/6/2015

  
Signature of Plaintiff



## Allegation 2 Cont: 8<sup>th</sup> Amendment

On January 8<sup>th</sup> 2012 inmate ledoux had sent a verbal threat through a retunda worker. The threat was if I didn't do what he said and make the plea go away he would hurt me and my family. That I would be bowws next Murder ("Referring to a murder in North unit") scared for the safety of myself and my family. I did as I ~~was~~ told on this date I turned it into a false Report.

On January 10, 2012 I seen Sgt Joel Vinsnoor and Jean Carroll and I said the report was false but in all reality it wasn't

On february 16, 2012 inmate ledoux had gotten the <sup>retunda</sup> ~~low~~ job and this was after I was found guilty on a D-Report. my SHU stay went down Hill at this point. I asked Co J. Humphreys why they allowed him the ~~low~~ Retunda Job he said "Cause no one believes you"

My Cloths came up missing. my food was being messed with and mail was coming up missing and my property was missing thing upon my return from Suicide watch(s)

I know my food was being mess with when I started to experience my Face tingle heart Rate upen and me falling a Sleep after eating. I brought this and made non-stop Complaints to the warden, Dir. Henk Nurse Supervisors, Dir Forbes, the Commissioner and the Lt and Captin and I was not even given help I was told I made false Allegations and so much other thing I started being treated wrong by Cpl miller and co



Haskell more for these Complaints. I tried to let it be known my Allegations was not false but NO one would listen. Cpl Miller and Co Haskell kept calling me a rat so all I'm heard

On July 10, 2012 Inmate Brandon Lanum #79441, told me someone was messing with my food and it wasnt him but I need to shut my skinner rat mouth before he starts to.

I had brought this to RN Patrick Keon about my food being messed with and now Co Michaud interfered with my medical Attention at a sick call. When he is only there for security. I was Denied all help and Complaints and Appeals by Captin Charles G. Bayajian, Lt Joseph Michaud (Not a CO) Warden Richard M. Gerry, Director Colon K. Forbes JR, Director Christopher Kench, Commissioner Wrenn, Sgt Dinsmoor and other people unknown at this time. Do to being forced to send out my property

I also had my safety put at risk by Cpl Miller, Co Haskell, Co Rooney and Sgt Carroll by letting it be known that I was telling (also known as Rating or Snitching)

Allegation 4: 8<sup>th</sup> Amendment / Sexual assault / Due Process /  
NH RSA 641:1

ON July 16, 2014 I was called to J 6 which housed inmate Corey fergul and inmate James Brisson. This was in RTU and it was at about 9:15 Pm.

Inmate James Brisson was asking me to come talk to him. I was nervous. But he called me into his Cell. He began pressuring me into sexual acts. I told him no that I just got into RTU after a hard fight. But he wanted it and he started by penetrating my Anus after forcing me to perform oral.

Officer wayne Defeo was doing a round when he seen and this happening. He was very angry slamming doors and yanking me around. I then stated nothing happend do to the fact I didnt trust any of the officers on such as CO John Aulis CO Dominic Salas Sgt Michael Shaw CO Wayne Defeo Cause they cant keep their mouth shut and feel every inmate should know everything. On July 16, 2014 I was Pared to the main Prison and because I didnt want to face SHU I went to the suicide tanks. I spent from July 16, 2014 through July 22, 2014 in the Health Service Center. on suicide watch then moved to south on 7/22/14.

I moved to South unit as I was C-3. which is Housed and over seen by Unit manager Robert P. McGrath. Not even 78 hours in his unit he is jumping down my Throat about my past history Involven Sexual acts in SHU and how his north Lt had told him about me. To which was holding me in the past.

On 7/25/2014 I was Served with a Disciplinary Report from sgt Ken Brown of SPU/RTU on a unrelated issue

but when I was read this Disciplinary Report UM McGrath to me "One more Fucking A Ticket I'll upgrade you" When I asked him about the one on his desk he Fliped it over and again said "Dont you be reading Fucking Shit on my desk and dont you be fucking worring about shit" I was Shocked at his words.

on 7/1/2014 Sgt Joel Dinsmoor and Marc of the investigations unit Came to South not even 20 min Later I was Called to the office. (Cpl Fleury already to my unit/pod why I was there "Because of a Prea in RTU") I tryed to tell them the truth behind the statement I wrote in SPU/RTU and how I didnt feel comfortable with the Staff. etc and I had finally Snaped because I couldnt take the emotional Abuse. I then left upon reentering my pod I was questioned by my pod harassed and later forced to move.

on 7/29/2014 UM McGrath Served me with the D-report I seen on his desk. I told him I wanted to take it to a hearing he called SPU/RTU and had me step out.

I appealed this through all levels do to ① Policy's was violated by SPU/RTU Staff, UM McGrath, Hearings officer Barton ② I was Sexually assaulted ③ Investigations put me at risk of Harm by Coming to South and Having me Come to the office during count ④ Non-Stop lyes after lyes were added on top of one issue mainly by Um Robert P. McGrath ⑤ I keep being victimized by Doc Officals. I was Denied by all levels.

On top of the fact that the PPD for Disciplinary reports

Allegation 4 Cont: 8<sup>th</sup> Amendment/Sexual Assault/Due Process  
NH RSA 641:1 (Perjury)

was not followed at All by the Hearings officer Barton. He Allowed um McGrath to do his Job. Sgt Thomas Akerley should have not written me up per FPD it should've been co Wayne DeFeo. Per FPD a um Cant take a Plea at a hearing only the hearing officer.

I was C-4ed over this issue when I was offically C-4 I went to the Suicide tanks well in the tanks I see James Brisson Still C-3. I was the victim of Sexual Assault and I was treated against Rules the Laws and the US and NH Constitution

I am still getting nowhere with this as I am doing reconsiderations and back tracking as New acts and misconduct is happening or popping up

Allegation 5: 8th Amendment -

I have been trying and trying to get diagnosed with G.D. and start my treatment to be a female. I am Sick of my Depression and my State of mind.

I have talked with Deb Green, Lois Harriman, Daryl Bazydlo, Cathrine Fontane, Jeffrey Fetter, Paul Brown, Barbara T. Slayton, Emily Bryant, and several others without any affect and I have been Denied it by all levels.

All I want is to start becoming a female. I've been getting the cold Shoulder since 2010 by people and everyone keeps blowing me off.

Now I wrote to Helen Hank (who is now the Commissioner Asst.) She Denied my request and so Did the Commissioner.

I am not wanting to take Showers I am being denied the Shaving Stuff by staff. Mental Health doesn't even want to talk to me about this issue.

## Allegation 6: Sexual Assault/8<sup>th</sup> amendment.

I was living in SPU from January 22, 2013 through July 2013 and August 2013 through July 2014

I was living on E-ward from January 22, 2013 through July 2013 and August 2013 through February 19, 2014 as a C-5 inmate

I moved to F-ward in or about February 19, 2014 to F-ward cell 20. F-ward is Supervised Care.

Not long after I moved to F-20 a ilm Matthew C. Rodier moved to F-3. I know Matthew Rodier from E-ward.

After ilm Scott Collier left on parole Matthew Rodier moved to cell F-9. I then ask Sgt Eric Barbaro to move to the low side. He moved me to F-3.

Not long after this ~~move~~ <sup>happend</sup> ilm Matthew Rodier started to pressure me into sexual acts. The sexual acts happend when Cpl Paige Kimball, Co Douglas Bishop, Co John Aulis, Co Dom Salce, Co Ryan G, Co N. Lavoie, Co Toni Keene and Co Aaron Belanger worked. Cause they were more worried about sitting in front of the TV in the dayroom(s) then what is going on in the cells. This had happend with other Co's but mainly the ones above

on / / 201 Cpl Stacie Lamontange issued a report and inmate Rodier was moved to F-cell 11. Mainly the report was in my medical Record on April 18, 2014 I was in Group with my social worker Barbara Slayton and another one. So I asked to be excused my social worker was not going to let it slide. So I was forced to let it out. I held it in so long do to the way the Doc held my other Reports I was emotionally unsure if I could handle the abuse so my social worker pulled me into the Attorney Visit Room. To which I pened on paper what happend.

~~1~~ 1

On April 18, 2014 I was put on ATC by my social worker and Captin Paul S. Cascio (ATC on F-ward)

On April 18, 2014 at 12:30 1/m Rodier was let out FOR his ten time he came to me started questioning me to what I said to the Captin. He also threatened me to Change the story.

I Seen Captin Paul Cascio on 2nd shift and filed out statements

I have appealed this through all chains of command. I've been Denied at all the levels

I appealed this do to the fact ① I was sexually assaulted do to the lack of Supervision in SPU by staff ② They did not follow PPD's ③ They did nothing to prevent it



## Allegation 7: Assault by Staff/Due Process

On March 2012 Cpl Craig Orlando and CO Christopher Ziemba came to my cell to get me for a d-report that Sgt Michael Shaw had for me. I was living on J-Teir.

Upon having my cell door opened CO Ziemba and Cpl Orlando had put a net over my head. (alleged to prevent spitting) As we were walking down the teir. We got to Cell J1 when next thing I know is I am being accused of spitting on Cpl Orlando and my head being smashed off the floor.

Finally Cpl Orlando pulls me up off the floor and I am still being escorted by CO Ziemba and Cpl Orlando. I was placed up against the wall outside the CIC's office with blood dripping on the wall and down my face.

I then am escorted by CO Ziemba and Sgt Shaw to the Dayroom on J-Teir. I demanded pictures and medical attention. To my dismay the Nurse had to be Patrick Keon. When Riv Keon saw me he said "Your not going to learn" Then said to Sgt Shaw "He'll be OK just give him a Ice pack and motrin. It's just a egg above his eye." I was denied Ice I had motrin in my cell. As I was being brought back to my cell CO Paul Hyson said "Your Fucking lucky that was not me I'd murdered you"

I later found out Lt Ernie Orlando and his son Cpl Craig Orlando made the decision not to take pictures.

I was then served with a D-report for this incident. I took it to a hearing and was found guilty.

I appealed this through all Chains do to ① I was assaulted ② There is 3 stories to 1 incident ③ I was punished on lies after lies I was denied at all levels



## Allegation 7: Assault by Staff/Due Process

This incident was then used against in a Criminal Case out of merrimack County Superior Court at a sentencing hearing the Alleged Victims was Sgt Shaw and RN Ke<sup>on</sup>~~en~~ which is another batch of lies and I am still working on it